FEMP Baseline Inspection Appendices

Appendix 1

To be added later.

Appendix 2

Comments and Responses to Comments
40 CFR 61, Subpart H Inspection Report Comment:
Section VII states "The following findings were observed actions, documentations, or lacks of actions and/or documentations during the baseline inspection of the FEMP...". It then states that all findings must be addressed. By combining findings with observations it becomes difficult to identify corrective actions: for example, General Findings 2, 3, 5, 7, 8, 12, and Specific Finding 14 are statements requiring no action. It is recommended that Section VII be divided into two sections: observations requiring no actions, and findings for those requiring actions.

Response to Comment:
The USEPA appreciates your views, however, this procedure has been used for several years at other USDOE facilities in Region 5 with no difficulties. The difficulty may be in the interpretation of the observationsby either FDF or DOE, or the lack of familiarity with the requirements under the regulation. In either case the USEPA is willing to assist FEMP to determine the necessary actions to meet the requirements, as is generally the case in enforcement actions. All observations or findings must be addressed. This does not mean that a specific corrective action nedds to be specifically initiated, and may just require a statement noting the concern and agreeing to keep it under consideration in the future.

Comment:
To ensure an acceptable response to each finding, it would be helpful if a regulatory requirement be referenced along with the finding. In some cases, determining whether the finding is a recommendation or is citing a nonconformance with a regulatory requirement is difficult. Examples include General Comments 1, 6, 11 and Specific Findings 3, 9, 12, and 15.

Response to Comment:
The USEPA appreciates this comment and will make an effort to assure that this procedure will be used to assist in prioritizing issues to be addressed in the inspection report.

Comment:
1) Suggest this be broken down into three independent findings: 1) The FEMP is not making adequate effort to measure the impact to the public...; 2) instrument background should be subtracted when measuring radon concentrations; and 3) effeorts should be made to measure radon concentration at the lowest level possible.

In addition, as stated in our general comment 2, it would be helpful if regulatory citations be provided to help define "adequate effort" with respect to measuring the impacts of silo headspace radon concentrations.

Response to Comment:
This comment has been divided into separate comments. The FFA on radon emissions from the K-65 silos and the FEMP indicates that radon emissions should be mitigated to 0.015 pCi/L above background at the nearest resident. Although this radon concentration is not measurable with the available technology, efforts should be directed at measuring concentrations at the FEMP fence line as low as possible.

Comment:
11) The FEMP has several action tracking systems to ensure corrective actions are carried out. Please clarify whether this finding is referring to corrective action tracking in the Laboratory.

Response to Comment:
This comment refers to the Laboratory.

Comment:
2) Based upon a telephone conversation, we understand there to be only one location that requires tree and brush removal. Please clarify that tree and brush removal is a concern only at the location of AMS22.

Response to Comment:
From a visual review it appeared that there was only one location where tree and brush removal was required, specifically AMS22. However, any other location that may not meet the siting requirements for particulate monitors will need to conform to the requirements of both the siting of monitors and collection of the particulate samples.

Comment:
3) Please provide a reference for the recommented height of 1.7 to 2 meters for alpha track-etch cups. We are familiar with this height recommendations for particulate monitors, but are unaware of similar recommendations concerning radon cups.

Response to Comment:
The height of the alpha track-etch cups and continuous radon monitors should be placed in the breathing zone. A good sampling practice would be to locate all samplers at the same height. Radon Measurement Operators Proficiency, Course Manual, Unit 3 Radon Measurement.

Comment:
8) Suggest the possibility of combining this finding with Specific comments 15 and 16. The first part of this finding is similar to Specific Comment 15, therefore, we recommend combining thaem into a single comment. The second part of this finding appears to relate to Specific Comment 16 and General Comment 9. Please consider combining these issues into a single specific finding that we can address with a single response.

Response to Comment:
USEPA appreciates your comment, however, the issues raised in these comments refer to two different locations and are not specifically related. Please note that these is some rearrangement of the report due to comments made, andthe referenced comments may not specifically match the current numbering scheme for the findings.

Comment:
9) The FEMP radon procedures refers to Type "F" and Type "M" cups not Type "L" as stated in the finding.

Response to Comment:
Type "M" cups..blind blank cups. Radon Measurement Operators Proficiency, Course Manual, Unit 3 Radon Measurement.

Comment:
10) This finding states that our radon vendor's RPM listing appears to be out of date. During our September 24, 1997 conference call we stated that it was our understanding that once a vendor was approved and listed with the National Radon Proficiency Program (RPP) their standing remained unless the vendor failed to pass a device performance test. U.S. Environmental Protection Agency (USEPA) disagreed with this statement, so we again contacted our radon vendor who forwarded the enclosed update on the USEPA's National Radon Proficiency Program, which was written by Phillip Jalpert of the USEPA. According to the update, biannual retesting of devices used in providing analytical services is no longer required. A device performance test is required only when the vendor applies to the program; however, the USEPA reserves the right to conduct blind tests anytime after receipt of an application.

Based on this information we assume our radon vendor is in good standing. If there is still disagreement, we will need to further discuss this issue.

Response to Comment:
While the vendor may be in good standing within the RPP, they are to be able to provide their annual calibration data to demonstrate their adherence with QA requirements of the program. These data should be provided on an annual basis to fulfill this QA demonstration for this facility. If the vendor cannot provide this information, then the vendor as well as the facility may be considered to be out of good standing or out of compliance with the QA requirements found in the rule.

Comment:
12) Under the alternate monitoring program the meteorological data will no longer be needed to demonstrate compliance, therefore a 95 percent recovery rate for meteorological data will not be a NESHAP compliance issue.

Response to Comment:
The requirement was not met for this inspection period. The approval had not been issued at the time of the inspection, so this comment is not appropriate.

Comment:
14) This Finding is questioning the location of air monitoring stations under the alternate monitoring system. These locations have already been approved by the USEPA as documented in a letter from Jack Barnette (USEPA) to Johny Reising (DOE-FEMP) dated August 11, 1997. It is our understanding that as a result of the September 24 conference call between the DOE, Flour Daniel Fernald, Inc. (FDF) and USEPA this finding will be eliminated from the final report.

Response to Comment:
This comment was made prior to approval of this alternate methodology. The County's concern to assure conservatism in the evaluation of a potential health threat is expected and the subsequent approval of this alternate methodology assure the maximum in conservatism with respect to the rule.

Appendix 3

CITATIONS FOR OEPA/OFFO FINDINGS
DURING DOE-FEMP NESHAPS INSPECTION-1997 VII. INSPECTION FINDINGS

GENERAL FINDINGS

1) While the real-time.....Efforts should be directed at measuring net radon concentrations as low as possible at the FEMP fence line.

CITATION: The FFA on radon emissions from the K-65 silos and the FEMP indicates that radon emissions should be mitigated to 0.015 pCi/L above background at the nearest resident. Although this radon concentration is not measurable with available technology, efforts should be directed at measuring concentrations at the FEMP fence line as low as possible.

SPECIFIC FINDINGS

1) ....wear gloves when exchanging filters.

CITATION: EPA/600/R-94/038b, April 1994, Quality Assurance Handbook for Air Pollution Measurement Systems, Volume II, Ambient Air Specific Methods (Interim Edition) Section 2.2.4 Sampling Procedure. Care must be taken to assure that the clean weighed filters are not damaged or soiled prior to installation int the high-volume sampler. The donning of gloves is a method to prevent the soiling of clean filters.

3) The height of the alpha track-etch cups should be consistent.....

Comment: Reword this finding to read as follows- The height of the alpha track-etch cups and

continuous radon monitors should be placed in the breathing zone. A good sampling practice would be to locate all samplers at the same height.

CITATION: Radon Measurement Operators Proficiency, Course Manual, Unit 3 Radon Measurement.

5 & 6) ....procedures out of date.

CITATION: Flour Daniel Fernald, Environmental Monitoring Project Procedure, Procedure Development and Training, ADM-01, (July 1997) Section 6.2[2]; states - Ensure procedures are reviewed yearly for changes.

9) ...Type "M" cups...blind blank cups.

CITATION: Radon Measurement Operators Proficiency, Course Manual, Unit 3 Radon Measurement.